



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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VIA ECF

Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Cassandra Alexander, et al., v. City of New York, et al.,
21-CV-5816 (WFK) (RLM)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and the attorney representing defendants City of New York (“City”), Manny Sharma, James Priore, and Damon Martin (collectively “City Defendants”), in the above-referenced action. City Defendants write on behalf of the parties to jointly request a sixty-day extension of time from August 1, 2022 to September 30, 2022, for the parties to complete fact discovery. This is the parties’ first request for an extension of fact discovery.

For the Court’s information, to date, plaintiffs have amended the complaint and defendants have answered, and the parties have exchanged discovery responses and engaged in settlement discussions. Regarding the discovery responses, the parties intend to promptly meet and confer concerning certain discovery disputes if the mediation scheduled for this Thursday, July 28, 2022, with the Honorable Viktor Pohorelsky, is unsuccessful.

In the event that mediation fails, the parties respectfully submit that they will need additional time to meet and confer regarding certain discovery disputes, potentially move to compel discovery if the parties’ conferral is unsuccessful, and to conduct the three to five depositions anticipated in this matter. To that end, the parties submit that an extension of the fact discovery deadline to September 30, 2022 should be sufficient for the parties to conclude the remaining fact discovery.

Accordingly, the parties respectfully request that fact discovery be extended from August 1, 2022 to September 30, 2022. The parties thank the Court for its time and consideration in this matter.

Respectfully submitted,



Ramy Louis
Senior Counsel

cc: Robert Howard Rickner, Esq. (via ECF)
Stephanie Panousieris, Esq. (via ECF)
Attorneys for plaintiffs